

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Experimental Changes to Implement)
Capital One NSA)

Docket No. MC2002-2

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT
(OCA/USPS-T2-22-25)
October 31, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-2 dated October 3, 2002, are hereby incorporated by reference.

Respectfully submitted,

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OCA/USPS-T2-22. Please refer to your responses to OCA/USPS-T2-7 and OCA/USPS-T2-8. Please confirm that in the first year of the Negotiated Service Agreement (NSA), if Capital One enters qualifying First-Class Mail volume of 1.025 billion pieces up to 1.225 billion pieces, Capital One will have access to the discounts contained in Article III, paragraphs E and F during the second and third years of the agreement. If you do not confirm, please explain.

OCA/USPS-T2-23. Please refer to your testimony at page 12, lines 8-20.

- (a) Please confirm that the Postal Service will collect data on the number of electronic address correction notices sent for First-Class Mail solicitations. If you do not confirm, please explain.
- (b) Please confirm that the Postal Service will separately collect and report data on the number of electronic address correction notices sent for First-Class Mail solicitations pieces that are forwarded and solicitations pieces that would otherwise be physically returned. If you do not confirm, please explain.

OCA/USPS-T2-24. Please refer to page 12, "C. Data Collection," of your prefiled testimony. Please describe any effort by the USPS to obtain data applicable to mailers beyond Capital One during the course of the proposed NSA.

OCA/USPS-T2-25. Please refer to your testimony at page 3, lines 7-10.

- (a) Please confirm that by concluding the NSA with Capital One, the Postal Service expects that Capital One's access to electronic Address Change Service (ACS)

- will reduce the volume of undeliverable-as-addressed (UAA) First-Class solicitation mail that is forwarded. If you do not confirm, please explain. If you do confirm, please provide an estimate of the reduction in volume of UAA First-Class Mail that is forwarded, showing all calculations and stating all assumptions.
- (b) Please confirm that by concluding the NSA with Capital One, the Postal Service expects that, during the course of the experiment, the number of electronic ACS notifications provided to Capital One for UAA First-Class solicitation mail that is forwarded will decline. If you do not confirm, please explain. If you do confirm, please provide an estimate of the reduction in the number of electronic notifications for pieces that are forwarded, showing all calculations and stating all assumptions.
- (c) Please confirm that by concluding the NSA with Capital One, the Postal Service expects that, during the course of the experiment, the number of electronic ACS notifications provided to Capital One for UAA First-Class solicitation mail that would otherwise be physically returned will decline. If you do not confirm, please explain. If you do confirm, please provide an estimate of the reduction in number of electronic notifications for pieces that would otherwise be physically returned, showing all calculations and stating all assumptions.
- (d) Since Capital One has no affirmative obligation imposed upon it (by either the NSA or the proposed DMCS language) to download the electronic ACS information, isn't it correct that the "receipt" referred to at line 10 of page 3 may or may not take place?
- (i) Please explain.

- (ii) Please explain how you take this uncertainty into account in developing estimates for parts (a) – (c) of this interrogatory (if estimates are provided).